

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.1 Identify and describe all fiber meet point arrangements established by Verizon in Massachusetts.

- (a) With respect to each and every fiber meet point arrangement identified in response to this data request, identify the other party to the fiber meet point arrangement, i.e. local exchange carrier, interexchange carrier, or other entity.
- (b) With respect to each and every fiber meet point arrangement identified in response to this data request identify the physical location of the arrangement in Massachusetts by reference to street address, municipality, county or other general geographic reference.

**SUPPLEMENTAL  
REPLY:** In compliance with the Arbitrator's ruling of September 7, 2006, please see the attached proprietary response.

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**ITEM: Charter 1.1**  
**SUPPLEMENTAL**  
**REPLY: Cont'd**

**BEGIN PROPRIETARY**

**END PROPRIETARY**

VZ #1S

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.8 **REVISED:** State whether Verizon has in the past undertaken fiber meet point arrangements before such time that a DS3's worth of traffic was being exchanged.

**SUPPLEMENTAL  
REPLY:** Verizon does not track or retain the requested information in any system or database that would enable the company to provide an unqualified reply. Based on general knowledge and belief, Verizon states that it is likely that it has established one or more fiber meet point arrangements before a DS3's worth of traffic was being exchanged.

**Verizon New England Inc.  
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**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.9 **REVISED:** State whether Verizon has in the past undertaken fiber meet point arrangements before such time that a DS3's worth of traffic was being exchanged.

**SUPPLEMENTAL  
REPLY:** Please see Verizon's supplemental reply to Charter 1.8.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.10 Identify and describe all fiber meet point arrangements established by Verizon with another local exchange carrier (incumbent LEC or competitive LEC), IXC or other entity which Verizon contends are currently underutilized, or do not represent an efficient use of network resources.

**SUPPLEMENTAL  
REPLY:** In compliance with the Arbitrator's ruling of September 7, 2006, please see the attached proprietary response.

**ITEM:** Charter 1.10  
**SUPPLEMENTAL**  
**REPLY:** Cont'd

**BEGIN PROPRIETARY**

**END PROPRIETARY**

VZ #10S

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.12 **REVISED:** Provide information as to whether any of Verizon's OC3 fiber optic systems deployed in Massachusetts or in any other state currently carry, or at any time carried, traffic volumes below 70% of a DS3 level.

**SUPPLEMENTAL  
REPLY:** Verizon states that it does not routinely measure traffic over its fiber transport systems nor does it maintain usage studies of those systems in a centralized database that would enable Verizon to provide an unqualified reply.

Based on general knowledge and belief, Verizon states that it is likely that many of its OC3 fiber optic systems deployed in Massachusetts at one time carried traffic volumes below 70% of a DS3 level.

**Verizon New England Inc.  
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**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.13 **REVISED:** Provide information as to whether any of Verizon's OC3 fiber optic systems deployed in Massachusetts or in any other state currently carry, or at any time carried, traffic volumes below 70% of a DS3 level.

**SUPPLEMENTAL  
REPLY:** Please see Verizon's supplemental reply to Charter 1.12.



**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.14 Identify and describe those locations in LATAs 126 and 128 where Verizon has deployed any of the following network facilities or equipment in conjunction with a fiber meet arrangement:

- (a) fiber optic lines or facilities;
- (b) fiber optic terminals, including any optical OC3 cards;
- (c) fiber network interface devices (or FNIDs);
- (d) add / drop multiplexing devices.

**SUPPLEMENTAL  
REPLY:**

Verizon does not track or retain the requested information in any system or database that would enable the company to provide an unqualified response in the time period allowed in the Hearing Officer's ruling on Verizon's motion to compel.

Based on general information and belief, Verizon states that all eight arrangements established in Massachusetts would involve (a) fiber optic lines or facilities, (b) fiber optic terminals, including optical OCn cards, and (d) add/drop multiplexers. Some also likely have (c) fiber network interface devices (FNIDs) deployed.

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**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.15 **REVISED:** Respond in general terms as to whether Verizon deploys equipment of the type that would be used in a fiber meet arrangement and the frequency of such redeployment.

**SUPPLEMENTAL  
REPLY:** In general terms, when an OC3 system or associated equipment is removed from service, it does become available for redeployment elsewhere within Massachusetts. When there is a subsequent need for an OC3 system, the engineer will review the inventory of equipment available for redeployment to determine if any of it will meet the needs of the new project or if new equipment is required. There are no reports or records available that would enable Verizon to accurately calculate or estimate the frequency with which equipment is actually redeployed.

**Verizon New England Inc.  
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**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Vincent Woodbury  
**Title:** Director - Product Development

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.16 Identify and describe all instances where Verizon has initiated or implemented marketing or other similar campaigns in Massachusetts in the last five years in order to retain or “win-back” telephone subscribers.

**SUPPLEMENTAL  
REPLY:** Information on promotions and bundled package offerings for the last three years is provided in this response. Information regarding promotions and similar campaigns that are more than three years old is not readily available.

Verizon service offerings initiated to retain or win-back residence customers over the last three years consisted of:

**Promotional Offerings**

Information concerning the most recent Residence Promotional Offerings provided by Verizon New England Inc. (d/b/a/ Verizon Massachusetts) for the last three years can be obtained from Verizon’s Massachusetts Tariff DTE No.10, Exchange and Network Services, Part A, Section 14. The tariff is available on-line at: <https://retailgateway.bdi.gte.com:1490/> by clicking on MA and then the link to effective tariffs. The time periods, locations, terms and conditions applicable to each promotion are described therein.

Earlier promotions during this period which have been repeated/replaced by a newer promotion are provided in Attachment I, describing the time periods, locations, terms and conditions of each earlier promotion, since that information is not available in the on-line site noted above. None of these promotions were offered for more than 90 days. None of the attached documents are available in electronic form.

**ITEM:** Charter 1.16  
**SUPPLEMENTAL**  
**REPLY:** Cont'd

**Packages/Bundled Offerings**

Information concerning Packages/Bundled Service Offerings that Verizon New England (d/b/a Verizon Massachusetts) made available for residence customers over the last three years can be obtained from Verizon's Massachusetts Tariff DTE No.10, Exchange and Network Services, Part A, Section 15. The tariff is available on-line at: <https://retailgateway.bdi.gte.com:1490/> by clicking on MA and then the link to effective tariffs. The time periods, terms and conditions applicable to each package or bundled service offering are described therein. The applicable rates and charges are contained in Verizon's Massachusetts Tariff DTE No.10, Exchange and Network Services, Part M, Section 1.15.

To the extent that packages or bundled service offerings have been removed or revised during the last three years, and are not reflected in the current tariff sections described above, Attachment II provides the terms, conditions, rates and charges applicable for the earlier time periods. None of the attached documents are available in electronic form.

Verizon service offerings initiated to retain or win-back business customers over the last three years consisted of:

**Promotional Offerings**

Information concerning the most recent Business Promotional Offerings provided by Verizon New England Inc. (d/b/a/ Verizon Massachusetts) for the last three years can be obtained from Verizon's Massachusetts Tariff DTE No.10, Exchange and Network Services, Part A, Section 14. The tariff is available on-line at: <https://retailgateway.bdi.gte.com:1490/> by clicking on MA and then the link to effective tariffs. The time periods, locations, terms and conditions applicable to each promotion are described therein.

Earlier promotions during this period which have been repeated/replaced by a newer promotion are provided in Attachment III, describing the time periods, locations, terms and conditions of each earlier promotion, since that information is not available in the on-line site noted above. None of these promotions were offered for more than 90 days. None of the attached documents are available in electronic form.

**ITEM:** Charter 1.16  
**SUPPLEMENTAL**  
**REPLY:** Cont'd

**Packages/Bundled Offerings**

Information concerning Packages/Bundled Service Offerings that Verizon New England (d/b/a Verizon Massachusetts) made available for business customers over the last three years can be obtained from

Verizon's Massachusetts Tariff DTE No.10, Exchange and Network Services, Part A, Section 15. The tariff is available on-line at: <https://retailgateway.bdi.gte.com:1490/> by clicking on MA and then the link to effective tariffs. The time periods, terms and conditions applicable to each package or bundled service offering are described therein. The applicable rates and charges are contained in Verizon's Massachusetts Tariff DTE No.10, Exchange and Network Services, Part M, Section 1.15.

To the extent that packages or bundled service offerings have been removed or revised during the last three years which are not reflected in the current tariff sections described above, Attachment IV provides the terms, conditions, rates and charges applicable for the earlier time periods. None of the attached documents are available in electronic form.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** John Conroy

**Title:** Vice President - Massachusetts

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.17 Identify those communities in Massachusetts where Verizon's FiOS service is currently available. Also identify all communities in Massachusetts where Verizon intends to introduce its FiOS service within the next thirty six months.

**SUPPLEMENTAL  
REPLY:** Verizon is constructing FTTP in the following 38 Massachusetts communities. The fact that a community appears on the list does not mean that FiOS is currently available to the entire community, as construction is ongoing.

Boxford  
Newton  
Holliston  
Dedham  
Lexington  
Belmont  
Topsfield  
West Newbury  
Marlborough  
Wellesley  
Needham  
Hopkinton  
Natick  
Westborough  
Sherborn  
Andover  
Westwood  
Lakeville  
Littleton  
Nahant

**ITEM:** Charter 1.17  
**SUPPLEMENTAL**  
**REPLY:** Cont'd

Sudbury  
Tyngsborough  
Dunstable  
Swampscott  
Lincoln  
Acton  
Canton  
Boxborough  
Middleborough  
Georgetown  
Bedford  
City of Lawrence  
Lynn  
Franklin  
Wilmington  
Medfield  
Rowley  
Wareham  
Burlington  
Hamilton  
Ipswich  
Lynnfield  
Reading  
North Reading  
Stoneham  
Wakefield  
Woburn  
Tewksbury  
Wenham  
Winchester

Verizon does not have definitive future plans for deploying FIOS in other Massachusetts communities. Moreover, Verizon has objected to producing this data on the grounds of privilege.

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**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.24 Identify and describe all geographic locations that Verizon has deployed fiber optics, or fiber facilities, in LATAs 126 and 128.

**SUPPLEMENTAL  
REPLY:** There are thousands of locations in Massachusetts where Verizon has deployed fiber facilities. Verizon keeps track of its fiber facilities (continuing property records) on paper plats, stick diagrams (not to scale) of the cables and their relative locations to streets/building, etc.

Verizon uses a computer system, Plat Management Tool (PMT), to manage the plat images as a data set. This data set also consists of thousands of records and is stored on computer servers that are only accessible on the Verizon intranet, at various engineering locations. Because of the enormous volume of documents that would have to be printed and copied in order to be produced to Charter, Verizon MA cannot respond to this request in this particular fashion in the time available, and doing so would present an undue burden on Verizon MA. However, pursuant to paragraph 4 of the Protective Agreement between the parties, Verizon will provide Charter with access to this database of voluminous, confidential information at a convenient Verizon office located in the Boston area, upon notice and during normal business hours.



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**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.25 Identify and describe any situation where Verizon has deployed fiber optics, or fiber facilities, to a length greater than five hundred feet from any central office to which the fiber is connected. Include in this response a statement of the additional incremental costs, beyond the cost of deploying the fiber the initial five hundred feet, to Verizon of deploying such facilities.

**SUPPLEMENTAL  
REPLY:** Virtually all fiber deployments extend greater than 500' from a central office. The cable plats being made available in reply to Charter 1.24 identify the size of the fiber, the year placed, the distance from the Central Office, and the length placed.

With respect to the cost of deploying fiber, please see the attachment "ECRIS Estimates Incremental Cost.pdf," which contains different examples (underground, aerial and buried) of 100' fiber/inner duct placements, which are applicable beyond the initial five hundred feet. The "Calc \$" field in the examples represents the estimated cost of material and labor for the particular work operation. It should be noted that the work operations provided are not necessarily the only work operations that would be required to install the fiber. The costs provided do not include engineering, contract (excavation/restoration etc.), police detail, permitting or other ancillary costs that are more often than not required to install the cable and may vary from job to job.

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**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist – Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.26 Identify and describe any situation where Verizon has deployed fiber optics, or fiber facilities, to length greater than three miles from any central office to which fiber is connected. Include in this response a statement of the additional incremental costs, beyond the cost of deploying the fiber for the first three miles, to Verizon of deploying such facilities.

**SUPPLEMENTAL  
REPLY:** The cable plants being made available in response to Charter 1.24 identify the size of the fiber, the year placed, the distance from the central office, and the length placed.

With respect to the cost of deploying fiber, please see Verizon's response to Charter 1.25, which are applicable beyond the first three miles.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** August 4, 2006

**ITEM:** Charter 1.27 Identify and describe the specific fiber optic facilities used to provide Verizon's FiOS services in Massachusetts.

**SUPPLEMENTAL  
REPLY:** Please see the attached charts that depict a typical FiOS deployment and the facilities used in such deployment.

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. Docket No. 06-56**

**Respondent:** Willett Richter  
**Title:** Senior Specialist - Engineering

**REQUEST:** Charter Fiberlink MA-CCO, LLC, Set #1

**DATED:** September 7, 2006

**ITEM:** Charter 1.28 **REVISED:** State whether Verizon currently has in its possession any of the following equipment in any Massachusetts staging warehouse.

- (a) add / drop multiplexers;
- (b) OC3 cards;
- (c) LGX fiber panels;
- (d) Fiber network interface devices;
- (e) Fiber optic cable.

**SUPPLEMENTAL  
REPLY:**

- (a) add / drop multiplexers - Yes
- (b) OC3 cards - Yes
- (c) LGX fiber panels - Yes
- (d) Fiber network interface devices - No
- (e) Fiber optic cable – Yes.